



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Volonich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director

FILE:  
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February 9, 1999

RE: DOE FEMP  
MSL #531-0297  
RESPONSES to U.S. EPA & OEPA  
COMMENTS ON THE DRAFT  
INTEGRATED ENVIRONMENTAL  
MONITORING PLAN  
(REVISION 1) January 1999

2014

Mr. Johnny Reising  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, OH 45329-8705

Dear Mr. Reising:

Ohio EPA has reviewed the Responses to U.S. EPA & OEPA Comments on the Draft Integrated Environmental Monitoring Plan (Revision 1) dated January 1999. This letter provides an additional set of Ohio EPA comments in the enclosed attachment.

If you should have any questions, please contact me at (513) 285-6466 or Donna Bohannon at (513) 285-6543.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

- cc: Jim Saric U.S. EPA
- Terry Hagen, FERMCO
- Ruth Vandegrift, ODH
- Francis Barker, Tetra Tech, Inc.
- Mark Shupe, Geo Trans
- Manager TPSS, DERR/CO
- Joe Bartoszek, OEPA
- Mike Proffitt, OEPA

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**RESPONSE TO U.S. EPA & OEPA COMMENTS  
ON THE DRAFT  
INTEGRATED ENVIRONMENTAL MONITORING PLAN  
(REVISION 1)**

Commenting Organization: OEPA  
Section: 3.7.1 Pg#: 3-82 Line#: 1 Code: C  
Commentor: HSI GeoTrans, Inc.  
Original Comment# 22

Comment: Clarification regarding the overall recalibration process is requested. Our understanding of the process is as follows: based on the original text and the comment response, it appears that the recalibration will be triggered if the five foot criteria are exceeded for some subset of the wells that are in close proximity to each other (thus indicating a subarea of the model is out of calibration). In determining whether or not the five foot criteria are exceeded, the water level resulting from the existing calibration for each well is compared to the water level measured in that well for the given quarterly monitoring event. If recalibration is required, the model (or a subarea of the model) will be calibrated to the water levels measured for the given quarterly event. The recalibration will be performed to the same standards (i.e., one foot tolerance) previously provided.

If the above interpretation is correct, the text revision presented in the Action portion of the comment response should be revised to read: "Future model calibration efforts will be performed using revised water levels based on the current monitoring period and in accordance with the same standard used to calibrate the SWIFT model."

Commenting Organization: OEPA  
Section: 3.7.1 Pg#: 3-82 Line#: 4 Code: C  
Commentor: HSI GeoTrans, Inc.  
Original Comment# 23

Comment: Agree in general with the bullet as revised. It would be appropriate to simplify the bullet to indicate that the decision to recalibrate would be based on general inspection of the model residuals (observed water levels subtracted from simulated). If the spatial distribution of errors over five feet does not appear more or less uniformly distributed over the model domain, recalibration will be performed in model subareas containing a disproportionate number of out of calibration wells.

The quarterly IEMP reports should include a map showing the distribution of residuals for the given monitoring period. A graph of the observed versus simulated heads should be provided. The comment response does not address reporting summary statistics for the model residuals. A summary statistic such as the root mean square difference between observed and simulated heads would also be useful to assess the overall

